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30 DAVID EDLIN

31 UNITED STATES DISTRICT COURT

32 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

33 OAKLAND

34 JANET HALEY,) Case No. C10-03856-PJH
35 Plaintiff,)
36 v.) STIPULATION AND PROPOSED ORDER REGARDING REQUEST FOR
37 COHEN & STEERS CAPITAL) CONTINUANCE OF DISCOVERY CONFERENCE
38 MANAGEMENT, INC., A New York) Date: August 31, 2011

1 Corporation Doing Business in California; and) Time: 2:00 p.m.
2 DAVID EDLIN, an individual,) Hon. Elizabeth D. LaPorte
3 Defendants.)
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IT IS HEREBY STIPULATED, by and among Plaintiff JANET HALEY ("Plaintiff"),
Defendant COHEN & STEERS CAPITAL MANAGEMENT, INC. ("Cohen & Steers") and
Defendant DAVID EDLIN ("Edlin") (collectively the "Parties"), through their respective
undersigned counsel, as follows:

WHEREAS, a Discovery Hearing has been set for August 31, 2011 and the deadline by
which the Parties would have been required to file a joint statement is August 30, 2011;

WHEREAS, the Parties are unavailable for the hearing date of August 31, 2011 and the
parties require more time to file a joint statement;

IT IS HEREBY FURTHER STIPULATED AND AGREED by and among the Parties
that, the Discovery Hearing set for August 31, 2011 be continued until September 7, 2011, or
another date thereafter that the Court is available, and the deadline to file a joint statement be
continued until September 2, 2011 at 12:00 p.m., or another date in accordance with the hearing
date.

IT IS SO STIPULATED.

DATED: August 30, 2011

SHEA LAW OFFICES

By: _____ /S/
Mary Shea Hagebols
Attorney for Plaintiff
JANET HALEY

DATED: August 30, 2011

VAN DE POEL, LEVY & ALLEN LLP

By: _____ /S/
Jeffrey W. Allen
Nina Paul
Attorneys for Plaintiff
JANET HALEY

1 DATED: August 30, 2011

SEYFARTH SHAW LLP

2 By: _____ /S/

3 Andrea N. de Koning
4 Attorneys for Defendant
COHEN & STEERS CAPITAL
5 MANAGEMENT, INC.

6 DATED: August 30, 2011

AKIN GUMP STRAUSS HAUER & FELD
7 LLP

8 By: _____ /S/

9 Catherine A. Conway
Attorney for Defendant
DAVID EDLIN

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~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED:

1. The Discovery Hearing set for August 31, 2011 is off-calendar and will be continued to Sept. 9, 2011 at ~~2:00~~ p.m.; and
 2. The deadline for the Parties to file a joint statement shall be extended from August 30, 2011 at 12:00 p.m. until Sept. 2, 2011 ~~at 12:00 p.m.~~

IT IS SO ORDERED.

DATED: August 30, 2011

Elijah R. D. Laponche
U.S. District Court Judge

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